

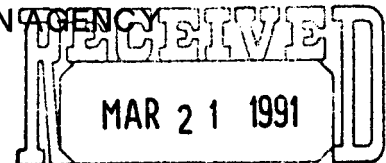


## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500

MAR 20 1991 DENVER, COLORADO 80202-2405

HAZARDOUS MATERIALS  
AND WASTE MANAGEMENT

Ref: 8HWM-FF

Gary W. Baughman, Unit Leader  
Hazardous Waste Facilities  
Hazardous Materials and Waste Management Division  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, CO 80220-3716

Re: Review and Comment: Interim  
Plan for Prevention of  
Contaminant Dispersion  
(IPPCD)

Dear Mr. Baughman:

The U.S. Environmental Protection Agency has completed review of the IPPCD and through this letter is forwarding comments to you for your review. As the Final Plan for the Prevention of Contaminant Dispersion will not be effective until later this year, we hope you will consider these comments during your review of the IPPCD. We are also copying DOE with this letter and the attached comments.

If you should have any questions regarding these comments, please contact me at (303) 294-1134.

Sincerely,

Martin Hestmark, Manager  
Rocky Flats Project

Attachment

cc: Frazer Lockhart, DOE

DOCUMENT CLASSIFICATION  
REVIEW WASTE  
CLASSIFICATION OFFICE

ADMIN RECORD

A-6W-001700

EPA Review and Comment on the  
Interim Plan for the Prevention of Contaminant Dispersion

General Comments. The document should refer to and be coordinated with those field operation Standard Operating Procedures which may be applicable. Particularly those SOPs concerning air monitoring, radiation monitoring, sampling and decontamination.

The interim plan objective can not be limited to establishing procedural requirements designed to mitigate potential hazards to offsite persons. The interim plan must be designed to minimize the potential for windblown dispersion of dusts containing hazardous substances or other harmful materials from all sites and must provide for the management of wastes to prevent windblowing and potential exposure to onsite workers.

Section 4.1. The IPPCD Specific Requirements Section needs to be clarified to determine whether the first two conditions are exclusive or serial. Also the third item does not seem to be a condition predicated a specific requirement. It appears to be a requirement tied to a specific type of activity.

The last paragraph detailing requirements governing activities where there is potential for producing suspended particulates should be reworded to say "Additionally, these precautions will be taken to prevent producing appreciable quantities of suspended particulate".

The IPPCD needs to be clarified to detail when roadways will be watered. What is meant by "as necessary"?